



One Penn Center  
1617 John F. Kennedy Boulevard, Suite 550  
Philadelphia, PA 19103  
www.garnerltd.com

Adam H. Garner  
Admitted to Practice in PA | NJ | MD

adam@garnerltd.com  
Tel. (215) 645-5955  
Fax (215) 645-5960

November 21, 2024

**VIA EMAIL & FACSIMILE**

The Honorable John Milton Younge  
United States District Court  
for the Eastern District of Pennsylvania  
601 Market Street, Courtroom 15-B  
Philadelphia, PA 19106

Re: *Bennett v. Schnader Harrison Segal & Lewis LLP et al*  
No. 2:24-cv-00592-JMY

Dear Judge Younge:

I represent Plaintiff Jo Bennett in the above-referenced putative class action. I write to provide the Court with an update regarding the parties' settlement efforts and with an unopposed request for clarification and/or modification of the Court's recent orders.

With respect to settlement, the parties' counsel agreed to a term sheet on the evening of November 18 to recommend to their clients containing terms on which the parties would settle the case. Plaintiff has approved of the term sheet. Plaintiff's counsel has signed the term sheet with Plaintiff's authorization and has sent it to Defendants' counsel. Defendants' counsel is in the process of reviewing the term sheet with their clients and collecting Defendant signatures. Plaintiff has the right to withdraw from the term sheet if Defendants have not signed by November 30.

It is unclear to Plaintiff's counsel whether the prior class certification deadline of December 6, 2024 remains in place. On October 30, 2024, the Court ordered that the December 6 class certification briefing deadline was stayed until November 12. ECF No. 83. It is unclear to Plaintiff's counsel whether that stay was intended to modify the December 6, 2024 class certification deadline. In the parties' November 12, 2024 Joint Status Report, Plaintiff requested that the class certification deadline be postponed to December 23, 2024. ECF No. 84. The Court then entered an Order setting a status conference for December 11, 2024, 5 days after the previously set class certification briefing deadline, but did not address whether the deadline had been moved to December 23, 2024.

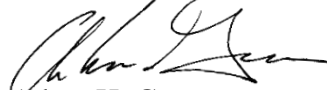
The Honorable John Milton Younge  
November 21, 2024

---

Given the parties' term sheet and the date of its expected execution, Plaintiff requests, and Defendants do not oppose, formally extending the class certification briefing deadline to December 23, 2024. Assuming the parties' term sheet is fully executed, the parties will notify the Court and request further modification of the Scheduling Order to set a deadline for a motion for preliminary approval of the settlement and for the related and unopposed motion for class certification that is necessitated by the settlement. In the event the term sheet is not signed, Plaintiff will file her motion for class certification on December 23, 2024. Neither party will be prejudiced by this request, which will help lead to the orderly resolution of this action.

The parties thank the Court for its consideration of this request.

Respectfully submitted,



Adam H. Garner

cc: All counsel of record (via email)